

GCD

Gardner Carton & Douglas

STEVEN J. MURAWSKI
(312) 569-1445
Fax: (312) 569-3445
smurawski@gcd.com

191 N. Wacker Drive, Suite 3700
Chicago, Illinois 60606

Tel 312 569 1000 Fax 312 569 3000
www.gcd.com

Washington, D.C.
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May 3, 2005

VIA FACSIMILE AND E-MAIL

E.L.
5/3/05

EPA Region 5 Records Ctr.



285438

Mr. Tom Turner
Associate Regional Counsel
United States Environmental Protection Agency - Region 5
Office of Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3590

**Re: Clayton Chemical Site General Notice of Potential Liability
UOP LLC**

Dear Mr. Turner:

The purpose of this letter is to respond to the United States Environmental Protection Agency's (U.S. EPA) recent request to provide copies of a material safety data sheet (MSDS) for "p-nitroaniline." As we understand it, the U.S. EPA will use that information, in part, to decide whether UOP LLC (UOP) will remain on the list of the top seventy-three generators at the Clayton Chemical Site (Site). Attached is the responsive information.

While we have provided the MSDS for p-nitroaniline, we hope that the U.S. EPA will consider the information in the proper context. Specifically, at no time did UOP ship p-nitroaniline to the Site. As we discussed, UOP previously used p-nitroaniline as a chemical feedstock in a reaction to manufacture a variety of antioxidant products at UOP's McCook, Illinois plant (Plant) until about 2000. Between 1981 and 1982, p-nitroaniline cost approximately \$1.50/pound and, during the subject reaction, was driven to extinction. Thus, UOP did not dispose p-nitroaniline because it served as a valuable chemical feedstock that was totally consumed in the chemical manufacturing process.

Instead, UOP shipped to TWI, Inc. for incineration empty 55 gallon fiber drums, which were formerly used to deliver the p-nitroaniline to the Plant. See *Exhibit 3 of March 25, 2005 Letter (Certificates of Incineration)*. The waste profile data sheet of the material shipped by UOP to TWI, Inc. for incineration was:

Mr. Tom Turner
May 3, 2005
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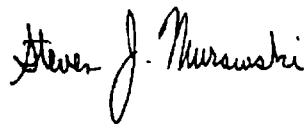
Fiber containers	94%
Polyethylene liners	2.5%
Filers	2.5%
Mineral adsorbent	0.5%
Rags	0.3%
Plastic gloves	0.2%

See Exhibit 1 of March 25, 2005 Letter. Thus, the most appropriate description of UOP's waste for the U.S. EPA's consideration is the one we previously submitted on March 25, 2005.

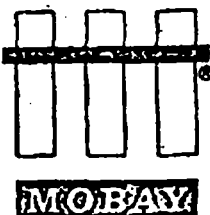
As we stated before, we hope that, after fully considering all of the information provided to date, the U.S. EPA will conclude that UOP should no longer be on the list of the top seventy-three generators at the Site.

We appreciate your time and consideration of these items.

Sincerely,



Steven J. Murawski



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MATERIAL SAFETY DATA SHEET

MOBAY CHEMICAL COMPANY
PITTSBURGH, PENNSYLVANIA 15205

SECTION I

MANUFACTURER'S NAME MOBAY CHEMICAL COMPANY		EMERGENCY TELEPHONE NO. 412-923-1800
ADDRESS (Number, Street, City, State, and ZIP Code) Penn-Lincoln Parkway West, Pittsburgh, Pennsylvania 15205		
CHEMICAL NAME AND SYNONYMS p-Nitroaniline & 1-Amino-4-nitrobenzene		TRADE NAME AND SYNONYMS p-Nitroaniline
CHEMICAL FAMILY Aniline derivative	FORMULA C₆H₆N₂O₂	
Code: T-248		

SECTION II HAZARDOUS INGREDIENTS

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
p-Nitroaniline	100	1 ppm

SECTION III PHYSICAL DATA

BOILING POINT (°F.) 637°F	(336°C)	SPECIFIC GRAVITY (H ₂ O=1) 1.437
VAPOR PRESSURE (mm Hg.) @142.4°C	1	PERCENT VOLATILE BY VOLUME (%)
VAPOR DENSITY (AIR=1)		EVAPORATION RATE (_____ -1)
SOLUBILITY IN WATER Insoluble		
APPEARANCE AND ODOR Yellowish crystals.		

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used) 390°F (199°C) C. C.	FLAMMABLE LIMITS Lel _____ Uel _____
EXTINGUISHING MEDIA Foam, dry chemicals	
SPECIAL FIRE FIGHTING PROCEDURES A self-contained breathing apparatus should be worn.	
UNUSUAL FIRE AND EXPLOSION HAZARDS This product is considered to be combustible. An explosion risk also exists.	

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SECTION V HEALTH HAZARD DATA	
THRESHOLD LIMIT VALUE	
p-Nitroaniline: 1 ppm	
EFFECTS OF OVEREXPOSURE	
This product is a powerful methemoglobin former with attendant hemolytic effect.	
On prolonged excessive exposures it may also cause liver damage.	
EMERGENCY AND FIRST AID PROCEDURES	

SECTION VI REACTIVITY DATA			
STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	
INCOMPATIBILITY (Materials to avoid)			
HAZARDOUS DECOMPOSITION PRODUCTS			
HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII SPILL OR LEAK PROCEDURES	
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED	
Mix with sodium bicarbonate and clean up as a normal spill.	
WASTE DISPOSAL METHOD	
Waste material may be incinerated under conditions which meet Federal, State, and local environmental control regulations.	

SECTION VIII SPECIAL PROTECTION INFORMATION			
RESPIRATORY PROTECTION (Specify type)			
A self-contained breathing apparatus should be worn.			
VENTILATION	LOCAL EXHAUST	SPECIAL	
	MECHANICAL (General)	OTHER	
PROTECTIVE GLOVES		EYE PROTECTION	
Rubber gloves.		Safety glasses.	
OTHER PROTECTIVE EQUIPMENT			
Protective clothing and protective shoes would be advisable.			

SECTION IX SPECIAL PRECAUTIONS	
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING	
OTHER PRECAUTIONS	

6-22-73

EMERGENCY PHONE NUMBER
MOBAY CHEMICAL COMPANY 412-923-1800

Legal responsibility is assumed only for the fact that all studies

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12/4/98
js**Hoechst Celanese**

Hoechst Celanese Corporation
Route 202-206 North
Somerville, NJ 08876
Telex 833 449
Fax 201 231 3225

Material Safety Data Sheet

THE EMERGENCY PHONE NUMBER IS: (201) 231-2244
FOR OTHER PRODUCT SAFETY INFORMATION CALL: (201) 231-2132

PAGE 1

-----PRODUCT IDENTIFICATION-----

VERSION DATE: 05/24/88
DATE PRINTED: 05/24/88

PRODUCT NAME:
P-NITROANILINE TRTQ
SYNONYMS:
P-AMINONITROBENZENE
CHEMICAL FAMILY:
NITROANILINE
MSDS NUMBER: 1150178226

-----HAZARDOUS INGREDIENTS-----

INGREDIENT:	PERCENT:	HAZARD DATA:
P-NITROANILINE (100-01-6)	99.0	EYE IRRITANT SKIN IRRITANT INHALATION HAZARD SKIN ABSORPTION HAZARD SEE EFFECTS OF OVEREXPOSURE

-----PHYSICAL DATA-----

PHYSICAL DATA	LOW	HIGH	UNITS	COMMENT
MELTING POINT	148		°C	
BOILING POINT	336		°C	(AT 1 ATM.)
SOLUBILITY IN WATER	0.8		G/L	(AT 20°C)
IGNITION TEMPERATURE	510		°C	
SPECIFIC GRAVITY (WATER =1)	1.437			
VAPOR PRESSURE	1		MMHG	

APPEARANCE AND ODOR:
FINE CRYSTALLINE YELLOW MATERIAL
D.N.A.: DOES NOT APPLY
N.M.: NOT MEASURED

-----FIRE AND EXPLOSION HAZARDS-----

FLASH POINT: 390 °F CLOSED CUP

EXTINGUISHING MEDIA:
CARBON DIOXIDE, WATER SPRAY, FOAM OR DRY CHEMICAL.

SPECIAL PROCEDURES:
USE SELF-CONTAINED BREATHING APPARATUS AND FULL PROTECTIVE CLOTHING.

UNUSUAL HAZARDS:
EMITS TOXIC AND CORROSIVE FUMES UNDER FIRE CONDITIONS.

-----HEALTH INFORMATION-----

SIGNS AND SYMPTOMS OF OVEREXPOSURE:
METHEMOGLOBINEMIA, CYANOSIS, ASPHYXIA, DYSPNEA, IRRITABILITY, NAUSEA,
VOMITING, HEADACHE, DIZZINESS, CONFUSION, WEAKNESS, STUPOR, WEIGHT LOSS,
CONVULSIONS, JAUNDICE, HYPOTENSION AND SKIN SENSITIZATION.

PRIMARY ROUTE OF EXPOSURE: INHALATION: YES SKIN ABSORPTION: YES INGESTION: NO
SKIN AND EYE CONTACT

EFFECTS OF OVEREXPOSURE:
IRRITANT TO SKIN, EYES AND RESPIRATORY PASSAGES.

Hoechst 

Hoechst Celanese

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Material Safety Data Sheet

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PRODUCT NAME:
P-NITROANILINE TRTRG

-----HEALTH INFORMATION----- (CONTINUED)

DEPRESSANT OF CENTRAL NERVOUS SYSTEM AND BONE MARROW.

TOXICITY:	ROUTE	TEST	DOSE	UNITS	COMMENTS
	ORL-RAT	LD50	750	MG/KG	
	ORL-RAT	LD50	3249	MG/KG	

TOXICITY TEXT:
THIS PRODUCT HAS BEEN REPORTED TO BE A MUTAGEN IN-VITRO.
CARCINOGEN: IARC: NO NTP: NO OSHA: NO

-----OCCUPATIONAL EXPOSURE LIMITS-----

T.L.V.: TWA		3	MG/M3
T.L.V.: TWA	1	PPM 6	MG/M3
1. ACGIH (SKIN)			
2. OSHA (PEL-SKIN)			

-----EMERGENCY AND FIRST AID PROCEDURE-----

INHALATION:
REMOVE VICTIM TO FRESH AIR. GET IMMEDIATE MEDICAL HELP.

EYE CONTACT:
FLUSH THOROUGHLY WITH WATER FOR 15 MINUTES. GET IMMEDIATE MEDICAL HELP.

SKIN CONTACT:
IMMEDIATELY REMOVE CONTAMINATED CLOTHING AND WASH AFFECTED AREA THOROUGHLY WITH SOAP AND WATER. GET MEDICAL HELP.

INGESTION:
DO NOT INDUCE VOMITING.
GET IMMEDIATE MEDICAL HELP.

ADDITIONAL MEASURES:
ADMINISTER ARTIFICIAL RESPIRATION IF BREATHING HAS STOPPED.
CONTACT LENSES SHOULD NOT BE WORN WHEN WORKING WITH THIS CHEMICAL.

-----REACTIVITY DATA-----

CHEMICAL STABILITY: STABLE HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

CONDITIONS TO AVOID:
AVOID CONTACT WITH STRONG OXIDIZERS OR REDUCERS.

HAZARDOUS DECOMPOSITION PRODUCTS:
THERMAL DECOMPOSITION MAY GENERATE
CARBON MONOXIDE, CARBON DIOXIDE AND OXIDES OF NITROGEN

-----SPILL OR LEAK PROCEDURES/WASTE DISPOSAL-----

SPILL OR LEAK PROCEDURES:
COLLECT INTO SUITABLE CONTAINER.

Hoechst 

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PRODUCT NAME:
P-NITROANILINE TRTRO

-----SPILL OR LEAK PROCEDURES/WASTE DISPOSAL----- (CONTINUED)

WASTE DISPOSAL:
DISPOSE OF OR INCINERATE IN ACCORDANCE WITH LOCAL REGULATIONS.
LISTED AS A HAZARDOUS SUBSTANCE, AS DEFINED IN THE COMPREHENSIVE
ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980.

-----EMPLOYEE PROTECTION -----

RESPIRATORY PROTECTION:
NIOSH APPROVED DUAL CARTRIDGE DUST RESPIRATOR RECOMMENDED.

PROTECTIVE CLOTHING:
CLOTHING SUITABLE TO PREVENT SKIN CONTACT.
SAFETY GOGGLES OR FULL FACE SHIELD.
RUBBER GLOVES.

ADDITIONAL PROTECTIVE MEASURES:
USE LOCAL EXHAUST VENTILATION.
USE LOCAL EXHAUST VENTILATION OR RESPIRATORY PROTECTION TO MAINTAIN
EMPLOYEE EXPOSURE BELOW THE P.E.L. OR T.L.V.

-----SPECIAL PRECAUTIONS-----

NONE

-----TRANSPORTATION REGULATORY REQUIREMENTS-----

DOT PROPER SHIPPING NAME:
NITROANILINE
DOT CLASSIFICATION:
POISON B
UN/NA: UN1661

LABEL:
POISON
OTHER DOT REQUIREMENTS:
NONE FOUND

OTHER REGULATORY CONTROLS:
THIS PRODUCT IS LISTED ON THE TSCA INVENTORY.
CERCLA HAZARDOUS SUBSTANCE SUBJECT TO SARA TITLE III SECTION 304;
RQ= 5000LBS/2270KG.
TSCA 8(A), 8(D) REPORTING REQUIREMENTS.

-----CLASSIFICATION/LABEL-----

HAZARD COMMUNICATION LABEL: 14.4

SARA HEALTH HAZARDS:
ACUTE: YES CHRONIC: YES FLAMMABILITY: NO PRESSURE: NO REACTIVITY: NO